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15 February 2016

Tessa Wallace  
BLM Project Manager  
BLM Great Falls Oil and Gas Office  
1101 15<sup>th</sup> Street  
Great Falls, Montana 59401

Re: Tendoy Project Scoping

Dear Ms. Wallace:

Thank you for the opportunity to comment on the APD submitted by the Lima Exploration Company, LLC, for exploration near Lima, Montana. Montana Trout Unlimited represents nearly 4,000 conservation-minded anglers, including several hundred in Southwest Montana who have an abiding interest in conservation in the Sheep Creek, Red Rock and Beaverhead watersheds. We have previously submitted comments during scoping for this project (see our letter 11-15), as well as for additional proposal in this area in the past. This included a formal protest of a previous proposal.

Regarding the new information provided for additional scoping:

- The BLM and the Forest Service should not consider the proposed access route in the Shearing Pen Gulch area. Montana TU does not believe constructing this much new road is prudent. Further, new road construction off the Big Sheep Creek road does not appear to comport with BLM guidance for National Scenic Byways.
- The BLM should identify the specific source of water the applicant will tap for use at the site, demonstrate that it comports with water use law, and, identify specifically how and where wastewater will be disposed.
- All alternatives should identify how impacts to large game, especially bighorn sheep and mule deer will be mitigated.
- Both agencies should identify all mitigation that will occur to reduce traffic-related impacts to recreation, wildlife and aquatic communities in the Little

- Sheep Creek drainage, should the White Pine Ridge site be chosen. This should include information on season of use, timing of traffic, and engineering improvements that will protect surface water from sediment delivery along the Little Sheep Creek road. Similarly, the EA should document how the activity proposed on either site, including any traffic that will occur in a travel corridor, will be timed in a fashion to minimize conflicts with recreational uses, such as hiking, angling and hunting.
- BLM should analyze and present an alternative that focuses on reducing traffic by using helicopters to deliver equipment and staffing to the proposed sites.
  - The EA should detail site reclamation measures, and ensure disturbance will be reclaimed immediately after drilling is complete.
  - The White Pine Ridge and Shearing Pen Gulch were likely heavily used in the past by native peoples. The EA should document the cultural resource survey that will occur before drilling is approved.

Thanks again for the opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Bruce Farling". The signature is written in a cursive, slightly slanted style.

Bruce Farling  
Executive Director